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I have the following comments regarding the Advanced Notice of Proposed Rulemaking on the National Bridge Inspection Standards (NBIS) as solicited by the FHWA on docket number FHWA-2001-8954 as published in the Federal Register: September 26, 2001 (Volume 66, Number 187).

APPLICATION OF STANDARDS

The FHWA should NOT develop it's own definition of a bridge for inspection and reporting. This would create unnecessary additional work and associated costs for all levels of government involved in surface transportation where there has not been a sufficient demonstrated need for such change.

The FHWA definition should NOT change the way a bridge length is determined or what the minimum bridge length should be for reporting purposes as this would create unnecessary additional work and associated costs for all levels of government involved in surface transportation where there has not been a sufficient demonstrated need for such change. The FHWA may desire to clarify the way the existing definition of bridge length is applied to certain structures where there is widespread inconsistency in application.

The FHWA may desire to allow structures of less than the minimum bridge length to be eligible for HBRRP funds in the HBRRP rules.

INSPECTION PROCEDURES

The FHWA should allow greater intervals between underwater inspections where safety is not impacted which would reduce the work and associated costs for all levels of government involved in surface transportation.

FREQUENCY OF INSPECTIONS

The interval of inspection for bridges which are stable for scour, which have no known defects and are operating within their design parameters should be allowed to have a 10-year inspection cycle, subject to a change in any the above conditions or catastrophic events which would warrant earlier inspection.

The level of service of a bridge should be taken into account for any inspection requirements. A bridge on a township road serving only farmland should not be held to the same inspection frequency as an interstate bridge, for example, if all other factors are equal between the two bridges.

QUALIFICATION OF PERSONNEL

A registered Professional Engineer who is in charge of inspection and reporting should NOT be subjected to any NBIS training requirements. A registered Professional Engineer is already required to determine whether he/she is qualified to act in certain capacities.

The FHWA should NOT require that bridge inspections be performed by either a civil or structural engineer who is a licensed professional engineer. To do so would create prohibitively increased costs which would be disproportionately high for local surface transportation agencies. There are a multitude of registered professional engineers in the surface transportation arena who are graduates of neither a civil

engineering nor a structural engineering curriculum yet are highly qualified to inspect and report on bridges.

The NBIS regulation should NOT specify the discipline of the registered Professional Engineer responsible for bridge inspections for the reasons enumerated in the preceding paragraph.

There should be no engineer in training component. An engineer in training who ultimately gains registration as a Professional Engineer must then determine whether he/she is qualified to act in certain capacities, as stated above. An engineer in training who does not subsequently gain registration as a Professional Engineer must comply with the existing NBIS regulations regarding experience and training. There has not been a sufficient demonstrated need for such change.

Those performing underwater inspections should NOT be required to be qualified licensed professional engineers. This would create unnecessary additional work and associated costs for all levels of government involved in surface transportation where there has not been a sufficient demonstrated need for such change.

INSPECTION REPORT

A regulation which would prohibit the individual in charge of inspection and reporting from submitting the inspection reports in accordance with that individual's best judgement would not be in the best interest of the public. It would create situations wherein the subordinate held authority over the supervisor which would create many more problems than it would solve.